ATTACHMENT A

SCOPE OF WORK FOR REMEDIAL ACTION

SITE: Combe Fill South, Operable Units 1 and 2
Block 17 Lot 7 - 98 Parker Road, Chester Township, Morris County, NJ 07930

SITE ID: EPA ID#: NJD94966611

Purpose

The purpose of this Interagency Agreement (IA) is to obtain technical assistance from the U.S. Army Corps of Engineers (USACE) for implementation of the OU1 and OU2 remedial actions for the Combe Fill South Superfund Site located in Chester Township, Morris County, New Jersey.

Background

The Combe Fill South Landfill Site (Site), U.S. Environmental Protection Agency (EPA) Superfund Site Identification Number NJD94966611, is located at 98 Parker Road, Chester Township, Morris County, New Jersey. EPA is the lead agency and the New Jersey Department of Environmental Protection (NJDEP) is the support agency.

Combe Fill South Landfill (Site) is an inactive municipal landfill located off Parker Road and extends into portions of both Washington and Chester Townships. The Site consists of three separate fill areas covering about 65 acres of the 115-acre parcel that was owned by the Combe Fill Corporation (CFC). The Site may have been operated from as early as the 1940s through 1981. Approximately five million cubic yards of refuse were estimated in the ROD to be contained within the landfill. The majority of waste disposed of at the Site was household waste and non-hazardous industrial waste.

The Site consists of three separate fill areas covering about 65 acres of the 115-acre parcel that was owned by the Combe Fill Corporation (CFC).

The Site is situated on a hill with surface waters draining radially from the Site. Groundwater and surface water runoff from the southern portion of the Site constitute the headwaters of Trout Brook, which flows southeast toward the Lamington (Black) River. Southwest of the Site, near the headwaters of the west branch of Trout Brook, is a hardwood wetland. Much of the original wetlands were cleared to construct the landfill. The Site is located in an area that is currently zoned for residential and limited commercial use.

Site History

Starting in the 1940s, the landfill was operated as a municipal refuse and solid waste landfill. From 1948 to 1978, Chester Hills, Inc. owned and operated the landfill. The landfill was originally

approved for the disposal of municipal and non-hazardous industrial wastes, sewage sludge, septic tank wastes, chemicals, and waste oils, as stated in its certificate of registration. In 1978, Chester Hills, Inc. transferred ownership and operations to CFC. From 1973 to 1981, there were numerous operating violations including the absence of an initial layer of residual soil on the bedrock prior to waste placement. In 1981, NJDEP issued an order for CFC to discontinue waste disposal operations upon completion of the existing trench. CFC ceased landfill operations and filed for bankruptcy protection. On September 1, 1983, the CFS Landfill Site was listed on the National Priorities List.

According to NJDEP files, wastes accepted at the landfill during its 40 years of operation included typical household wastes, personal care products, pharmaceutical products, calcium oxide, crushed containers of paints and dyes, aerosol product canisters, industrial wastes, dead animals, sewage sludge, septic tank wastes, chemicals, waste oils, and possibly asbestos. Numerous empty 55-gallon drums were scattered across the landfill surface. Most of the wastes that were encountered during field reconnaissance, drilling operations, and test pit excavations included typical household wastes (garbage bags, paper, appliances, etc.). Refuse encountered during the drilling of a well that permeated the center of the landfill appeared to be highly decomposed rubbish. Hazardous materials were not found at the surface of the landfill during field operations.

Based on the original landfill design drawings and records of waste volumes received on-site, approximately five million cubic yards of waste material are buried in the CFS Landfill. No evidence has been found of disposal of hazardous materials outside of the Site boundaries.

Record of Decisions Requirements

The RD is intended to meet the requirements of the OU1 ROD amendment and the interim OU2 ROD remedy at the Site. The following Remedial Action Objective (RAOs) were developed for the OU1 ROD amendment:

- Limit migration of contaminated groundwater and leachate from OU1 to OU2;
- Enhance the GWET system to reduce concentrations of 1,4-dioxane being discharged to surface water;
- Reduce the toxicity, mobility and volume of contamination in the North Waste Cell to reduce impact on groundwater; and
- Prevent exposure to contaminated groundwater.

The following RAO was developed for the OU2 interim remedy:

- Prevent current and future exposure to human receptors (via ingestion, dermal contact and inhalation) to Site-related contaminants in groundwater and surface water at concentrations in excess of federal and state standards.

OU1 and OU2 2018 ROD remedies include the following components to meet the RAOs:

- OU1
    - o Upgrade existing GWET system to handle an increased volume of contaminated

groundwater;
o Install bedrock extraction wells near the OU1/OU2 border to increase hydraulic control of contaminated groundwater in OU1;
o Upgrade the OU1 GWET treatment system to include treatment for 1,4-dioxane;
o Excavate and off-site disposal of source material in the North Waste Cell area1; and;
o Conduct long-term monitoring (LTM) and institutional controls (ICs).

• OU2

o Conduct LTM for groundwater located outside of the landfill property boundary and ICs.

STATEMENT OF WORK

Remedial Action Activities

The USACE shall review relevant background documents to achieve a familiarity with the Site and the scope of the remedial design. These documents include, but may not be limited to, the September 2018 Amended Record of Decision for OU1 and Interim Remedy for OU2, the 90% Preliminary Design Investigation Report, and the 90% Remedial Design package. The USACE shall review the 90% documents and provide comments to EPA, ASAP, in order to finalize the remedial design report, specifications, drawings and other relevant documents. Background documents are available electronically and will be forwarded to the USACE upon award of the IA.

The USACE shall be responsible for procuring a construction contractor or contractors to conduct the RA in accordance with the objectives of the Remedial Design. EPA recommends that the USACE obtain support services from the designer of the RD. The RA shall be consistent with the RD/RA Handbook OSWER 9355.0-04B, EPA 540/R-95/059, June 1995, and all other guidance used by EPA in conducting the RA. The selected contractor(s) shall meet the qualifications and experience requirements for conducting the remedial action at the Site.

The USACE shall be responsible for developing a request for proposal (RFP), evaluating proposals, negotiating purchase orders, and managing the services of the contractor(s) to conduct the RA. The procurement process shall be completed in compliance with federal regulations and procedures.

The USACE shall be responsible for furnishing or ensuring its contractor furnishes all necessary and appropriate personnel, materials, and services needed for, or incidental to, performing and completing the RA. The USACE shall be responsible for ensuring that contractor key personnel meet the qualifications of the work elements.

The USACE shall appoint a Site Manager who will serve as a point of contact for the EPA RPM. The Site Manager shall contact the EPA RPM at least weekly to provide project updates, in addition to the monthly electronic reporting requirement specified in the terms and conditions of

this IA. All remedial action activities shall be coordinated with the EPA RPM.

The USACE shall provide oversight and monitoring of construction/remedial activities in coordination with the EPA RPM to ensure compliance with all contract requirements and specifications. In addition, USACE will provide weekly updates to the RPM, unless another schedule agreeable to EPA is established, to discuss/document construction/remedial progress, problems or any other pertinent issues.

The USACE shall be responsible for reviewing and commenting on any contractor deliverables. The USACE shall be responsible for ensuring contractor plans meet project needs and are completed and conducted in accordance with EPA's latest guidance documents and applicable Federal, state and local regulations.

The USACE shall be responsible for developing, updating and implementing site specific plans such as the Site Management Plan (in accordance with New Jersey State requirements), the Health and Safety Plan, the Sampling and Analysis Plan, and the Construction Management Plan, as necessary and in accordance with EPA's latest guidance documents and applicable Federal, state and local regulations. The USACE shall be responsible for ensuring contractor plans in the above areas meet project needs and are completed and conducted in accordance with EPA's latest guidance documents and applicable Federal, state and local regulations.

The USACE shall provide for disposal of all wastes in accordance with local, State, and Federal regulations.

If the USACE determines that additional data is necessary to complete the RA, the USACE shall, with the concurrence of the EPA RPM, arrange for the collection of this data.

The USACE shall follow the EPA Region 2 Field and Analytical Services Technical Advisory Committee (FASTAC) procedures. For all non-time critical data collection projects, EPA Region 2 requires that a sequential decision tree for procuring Superfund analytical services be followed, which includes:

- Tier 1: EPA Region 2 LSASD laboratory (with ESAT support)
- Tier 2: National Analytical Services Contract Laboratories (CLP and Non-RAS)
- Tier 3: Region Specific Analytical Services (SAS) Contract laboratories
- Tier 4: Contractor, IA and Field Contractor Subcontract laboratories

The USACE shall follow the FASTAC strategy unless written direction is provided by the Chief of the New Jersey Remediation Branch to deviate from the FASTAC strategy. This letter shall be submitted to the RSCC along with the sample booking request form.

The USACE shall provide electronic submittal of sampling data in accordance with EPA Region 2 policies, guidelines, and formats.

The USACE shall be responsible for reviewing RA deliverables to ensure that the remedial activities/performance goals and standards are being met. Copies of these deliverables must be

provided to the EPA RPM.

The USACE shall provide other support, as directed by EPA, such as technical assistance to include permit compliance, sampling and monitoring, community relations, etc.

The USACE shall be responsible for conducting a pre-final inspection and preparing a Corrective Action Plan as necessary.

The USACE shall be responsible for conducting final inspection and certification of the completed remedial action in coordination with the EPA RPM.

The USACE shall provide for operations and maintenance of the remedy for a period of no more than one year in accordance with 40 CFR Section 300.435, the RD/RA Handbook OSWER 9355.0-04B, EPA 540/R-95/059, June 1995, and all other guidance used by EPA in conducting the RA.

The USACE shall provide for dismantling, packing-up, and moving off-site any temporary facilities or equipment used during the course of the RA.

The USACE shall be responsible for submitting a Remedial Action Report (RAR) complete with all backup documentation in accordance with EPA's latest guidance documents.

OTHER REQUIREMENTS

The EPA RPM shall be notified at least sixty days in advance of reaching 75 and 100 percent expenditure of the total approved IA budget.

The USACE shall submit monthly progress reports in an electronic format to the EPA RPM and Project Officer, which summarize the following: sampling data results, activities underway during the monthly period, activities scheduled, progress of work, and any outstanding problems or concerns. A monthly cost report shall also be provided to EPA.

The USACE shall use technologies and practices that are sustainable in accordance with EPA Region 2 Clean and Green policy (March 2012) or most current version found at http://epa.gov/region2/superfund/green_remediation/. At the direction of the EPA RPM or EPA Project Officer, the USACE shall incorporate requirements for the appropriate practices into the terms of its contracts consistent with the EPA Region 2 Clean and Green policy. The USACE shall report monthly on the use of these technologies and practices, including the associated quantities of materials reduced, reused, or recycled as a direct result of these practices, for all remedial activities conducted under this IA within its monthly status report submission.

The USACE shall comply with EPA Directive OSWER 9335.5-24 which states that when it is estimated that the RA cost plus the cost of LTRA for a project will be less than $25,000,000, a VE screen should be conducted; if that VE screen finds that a VE study is warranted, the study should then be conducted. A full VE study should always be conducted for projects (or phases of projects) where the combined life cycle cost is estimated to be $25,000,000 or more.

The USACE shall be responsible for maintaining all technical and financial records associated with this IA.

At the completion of this IA, the USACE shall perform all necessary closeout activities as specified in the IA. The closeout activities may include closing out any contracts, indexing and consolidating project records and files as required above, and providing a technical and financial closeout report to EPA.

Project Organization

The EPA RPM for this project is:

Pamela J. Baxter, Ph.D., CHMM
U.S. Environmental Protection Agency - Region 2
290 Broadway - 19th Floor
New York, NY 10007-1866
(212) 637-4416